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15 *Attorneys for Defendant: Otto Trucking LLC*

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**  
18 **SAN FRANCISCO DIVISION**

19 Waymo LLC,

20 Plaintiff,

21 v.

22 Uber Technologies, Inc.; Ottomotto LLC;  
Otto Trucking LLC,

23 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF HONG-AN VU IN  
SUPPORT OF MOTION IN LIMINE TO  
EXCLUDE TESTIMONY OF DR. HESSELINK  
REGARDING PROTECTIONS OF WAYMO'S  
ALLEGED TRADE SECRETS**

Date: September 27, 2017  
Time: 8:00 a.m.  
Courtroom: 8 (19th Floor)  
Judge: Hon. William Alsup

Filed/Lodged Concurrently with:

1. Motion in Limine to Exclude Testimony; and
2. [Proposed] Order

Trial: October 10, 2017

**DECLARATION OF HONG-AN VU**

I, Hong-An Vu, declare as follows:

1. I am an associate at the law firm of Goodwin Procter, LLP, representing defendant Otto Trucking LLC (“Otto Trucking”) in this matter. I am a member in good standing of the State Bar of California. I make this declaration in support of Notice of Motion and Motion in Limine to Exclude Testimony of Dr. Hesselink Regarding Protections of Waymo’s Alleged Trade Secrets. Unless otherwise stated, I make this declaration based upon matters within my own personal knowledge and if called as a witness, I could and would competently testify to the matters set forth herein.

2. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from the expert report of Dr. Lambertus Hesselink.

3. Attached hereto as **Exhibit 2** is a true and correct copy of excerpts from the deposition of Michael Janosko dated August 25, 2017 based on the local date and time in Sydney Australia, August 24, 2017 based on Los Angeles, California local time.

4. Attached hereto as **Exhibit 3** is a true and correct copy of the Declaration of Michael Janosko.

5. Attached hereto as **Exhibit 4** is a true and correct copy of WAYMO-UBER-00047580 - 00047581.

6. Attached hereto as **Exhibit 5** is a true and correct copy of WAYMO-UBER-00086885 - 00086892.

7. Attached hereto as **Exhibit 6** are excerpts from the deposition of Alexander (Sasha) Zbrozek dated September 6, 2017.

8. Attached hereto as **Exhibit 7** are excerpts from the expert report of Erik Laykin, dated September 7, 2017.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed this 16th day of September, 2017 in Los Angeles, California.

/s/ Hong-An Vu  
HONG-AN VU

**ATTORNEY ATTESTATION**

Pursuant to Civil Local Rule 5-1(i)(3), I, Neel Chatterjee, hereby attest that concurrence in the filing of this document has been obtained from any signatories indicated by a “conformed” signatures (/s/) within this e-filed document.

Dated: September 16, 2017

/s/ Neel Chatterjee  
Neel Chatterjee